

REMARKS/ARGUMENTS

In the specification, the paragraph beginning at Page 9, line 15 has been amended to add the name of manufacturers from which coil threaded products are commercially available. No new matter has been added to the application as no technical information is presented, only the name of manufacturers from which the products are available.

Claims 1-22 remain in the application. Claims 11-20 have been withdrawn as a result of an earlier restriction requirement. Applicant retains the right to present claims 11-20 in a divisional application.

The disclosure has been objected to as being unclear as to what is meant by "coil" threads. The coil threads are not a separate part, but are a specific type of thread commercially available, for instance from Western Tap Manufacturing Co., Inc. of Buena Park. California. They are particularly applicable to the purpose of the insert of the present invention, being used in steel plates on construction sites and streets, because they are very strong by design, can be used to lift great weights without breaking, can handle debris in the threads with less

difficulty and may be cleaned easily while retaining high tensile strength needed to lift the heavy weight of the plates, as set forth on page 9 beginning at line 15 of the specification, amended herein.

The drawings have been objected to as requiring that "coil threads" must be shown. Applicant contends that there is no need to show "coil threads" as compared to any other threads normally shown in drawings since they are commercially available and the manufacturer's specifications are attached to the Declaration of inventor, Thomas Lyon, in the Appendix of this paper.

Claim 3 is rejected as failing to comply with the written description requirement. Since the specification has been amended and the information and specification sheet for coil threads is attached to the Declaration of the inventor, sufficient information is contained in the specification with reference to the "coil threads".

Claims 1 and 21 are rejected as being anticipated by Viscio, et al. This rejection is respectfully traversed.

Claims 2, 4-10 and 22 have been rejected as being unpatentable over Viscio, et al. These two rejections will be discussed together.

Claim 1 has been amended to point out that the steel plate has a threaded hole cut completely through it, and in addition, there is present a thread locking compound between the male threads on the outer surface of the insert and the threads of the hole in the steel plate. Viscio, et al describes a device for locking a threaded insert into a prepared hole in parent material. A pin 1 slides into a cutaway slot 9 in the external threads of the tubular member. Locking pin 1 has a first breakaway portion 2, a second cutting portion 3, and a locating finger 4. The pin is inserted and then broken off to lock the tubular member in place.

This type of locked threaded insert of Viscio et al is precisely the type of insert which has caused the inventor herein to create the insert of this invention, which is far superior to the type of insert described by Viscio, et al. As described on pages 3 and 4 of the specification and, in addition, page 5 of the specification beginning at line 10, it is pointed out that Applicant's inserts differ from inserts that are welded into place or locked into place, such as Viscio, et al, in that Applicant's inserts are not mechanically "locked" into place and thus are removable. The other prior art inserts all use some locking device or welding for securement and are extremely difficult to remove if damaged. These inserts have a

problem with coming loose and tearing out, which the prior art has solved by welding or mechanical locking. Applicant's inserts simply need to be heated to about 300°F to release the chemical thread locking compound, and are then easily removable. Since these inserts often get damaged in use, they often have to be removed and a new insert replaced. With the type of insert described by Viscio, et al, this is accomplished only with great difficulty and, in fact, the type of insert described by Viscio, et al often damages the threads in the hole of the parent material, making the replacement of the insert impossible, until the threads in the parent material (steel plate) are repaired.

The Examiner contends that a person having ordinary skill in the art would have experimented with various inserts and would have chosen the best material, size, thread-pitch and type of thread to use. However, no references have been cited which describes the insert system now described in the claims. Applicant's claims now describe an insert which is effective for the purpose of lifting and moving very heavy steel plates. The insert now in use in the prior art needs a special mechanical locking system, as in Viscio, et al.

Due to the thread locking compound, the insert is held in place even though extremely heavy weights are supported therewith. In addition, the use in the preferred embodiment, of

coil threads, which are specifically used because of their ability to hold great weights, withstand damage and infiltration of dirt, has not been described in any reference, and the combination of these features has created an insert designed to be used in very heavy steel plates, which is far more effective and yet easier to remove and replace than any insert shown in the prior art. The effectiveness of the inserts of this invention have been proven in the tests conducted and described on pages 11 and 12 of the specification.

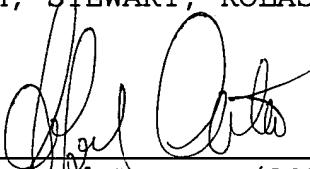
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Sanford Astor (Reg. No. 20748) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By


Sanford Astor, (20748)
10940 Wilshire Blvd.
18th Floor
Los Angeles, CA 90024
(310) 209-4400